

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

LETICIA LEE,

Plaintiff,

v.

WARNER MEDIA, LLC; HBO HOME
ENTERTAINMENT, INC.; WARNER BROS.
WORLDWIDE TELEVISION DISTRIBUTION
INC.; NBC UNIVERSAL TELEVISION
STUDIO DIGITAL DEVELOPMENT LLC; CBS
BROADCASTING INC.; GRAMMNET NH
PRODUCTIONS

Defendants.

Case No. 6:23-cv-06025-FPG

Removed From:

Supreme Court of the State of New
York, County of Ontario

Index No.: 134539-2022

**DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S
AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendants Warner Media, LLC; HBO Home Entertainment, Inc.; Warner Bros. Worldwide Television Distribution Inc.; NBC Universal Television Studio Digital Development LLC; CBS Broadcasting Inc.; and Grammnet NH Productions ("Defendants") request a 45-day extension of time to respond to Plaintiff's Amended Complaint, until March 6, 2023.¹ Plaintiff LeTicia Lee has not responded to Defendants' request for Plaintiff's consent to this motion.

Plaintiff, proceeding pro se, filed her Amended Complaint in this copyright action on November 16, 2022, in the Supreme Court of the State of New York, County of Ontario. In the Amended Complaint, Plaintiff asserts claims against Defendants for copyright infringement of Plaintiff's purported "original treatment, and pilot script" entitled "Girlfriends" that she allegedly created and registered with the U.S. Copyright Office in 1991. The Amended Complaint alleges that Defendants' respective popular television shows "Living Single" (1993-1998), "Friends"

¹ A 45-day extension falls on March 4, 2023, which is a Saturday. Accordingly, Defendants request an extension until the following Monday, March 6, 2023.

(1994-2004), “Sex and the City” (1998-2004), and “Girlfriends” (2000-2008) (the “Shows”), all infringe her purported treatment and pilot script.

On December 12, 2022, Defendant CBS Broadcasting Inc. was served with the Amended Complaint. On December 13, 2022, Defendants Warner Media, LLC; HBO Home Entertainment, Inc.; Warner Bros. Worldwide Television Distribution Inc.; and NBC Universal Television Studio Digital Development LLC were served with the Amended Complaint. On January 6, 2023, Defendant Grammmnet NH Productions accepted service of the Amended Complaint.

On January 11, 2023, Defendants timely removed this case from the Supreme Court of the State of New York, County of Ontario to this Court. Pursuant to Federal Rule of Civil Procedure 81(c)(2), Defendants’ current deadline to respond to Plaintiff’s Amended Complaint is January 18, 2023.

Defendants seek an extension of time for the following reasons. First, the action names six Defendants and concerns claims involving the four different Shows that were developed and originally aired over decades ago. Second, Defendants were only recently served with the Amended Complaint. Third, while Plaintiff’s claims rest on the alleged “continual copyright infringement” of her 1991 television treatment and pilot script, which are incorporated by reference in her Amended Complaint, Plaintiff does not attach the treatment or script to the Amended Complaint. Defendants have requested the documents from Plaintiff – see below – but have also filed to receive the material on an expedited basis from the U.S. Copyright Office. Defendants have not received the materials to date and, once received, they will need to review those materials and compare them with the distinct Shows developed by the various Defendants in order to adequately respond to Plaintiff’s allegations. Accordingly, the requested extension of

time would permit Defendants additional time to sufficiently investigate Plaintiff's allegations and fully respond to the Amended Complaint.

On January 12, 2023, Defendants' counsel called Plaintiff and left her a voicemail requesting this 45-day extension.² That same day, Defendants' counsel also followed up via text message to Plaintiff, requesting the 45-day extension and further requesting that Plaintiff send Defendants' counsel her allegedly infringed, registered material. Plaintiff did not respond.

The requested extension shall not disrupt the schedule in this case or prejudice any party, particularly since here claims originally arose decades ago. This is Defendants' first request for extension of time.

Accordingly, Defendants respectfully request a 45-day extension of time to respond to Plaintiff's Amended Complaint from the current January 18, 2023, deadline, until March 6, 2023.

Dated: January 13, 2023

Respectfully submitted,

/s/ Elizabeth A. McNamara

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Universal Television Studio Digital Development
LLC; CBS Broadcasting Inc.; and Grammmet NH
Productions*

² Plaintiff's email address is not listed on her Amended Complaint, and she has declined to provide Defendants with that information. Accordingly, to date Defendants have only been able to reach Plaintiff via her telephone number.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of January, 2023, true and correct copies of the foregoing Motion for Extension of Time to Respond to Plaintiff's Amended Complaint and Proposed Order, filed electronically through the Court's CM/ECF system, were mailed via overnight Federal Express to Plaintiff LeTicia Lee at the following address:

LeTicia Lee
1335 Jefferson Rd #20711
Rochester, NY 14602

/s/ Elizabeth A. McNamara
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